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April 13, 2020

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**VIA ECF**

Hon. Katherine Polk Failla  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**MEMO ENDORSED**

**Re: *Ramirez v. Elite Service Group, LLC, et al.***  
**U.S. District Court, S.D.N.Y., Civil Case No. 19-cv-03237 (KPF)**

Dear Judge Polk Failla:

This firm represents the Defendants in the above-referenced action. Defendants respectfully write, on behalf of all parties, to request a 30-day extension of the deadline set forth in Your Honor's March 16, 2020 Order to file a stipulation of discontinuance or move to restore the case, from April 15, 2020 to May 15, 2020.

The basis for this request is that the parties are still finalizing and signing a settlement agreement. Plaintiff has been provided 21 days to review the term of confidentiality in connection with the settlement agreement in accordance with General Obligations Law § 5-336 and CPLR § 5003-b, and that period will lapse on April 16, 2020. The parties then expect to be able to finalize and execute the remainder of the agreement, and file a stipulation of discontinuance with prejudice on or before May 15, 2020.

The parties thank the Court for its time and consideration of this matter.

Respectfully submitted,

*Kelly C. Spina*

cc: all counsel of record (*via ECF*)

Application GRANTED. The period of conditional discontinuance is hereby extended to May 15, 2020.

Dated: April 13, 2020  
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE